

Form **1040X** (Rev. February 2009) **Amended U.S. Individual Income Tax Return** OMB No. 1545-0074

Department of the Treasury Internal Revenue Service

See attached email
STATUTE EXPIRES 01/01/2017
2/24/2012 See separate instructions.

This return is for calendar year **2008**, or fiscal year ended

Please print or type

Your first name and initial **JAMES D** Last name **PIERON, JR.** Your social security number [REDACTED]

If a joint return, spouse's first name and initial Last name Spouse's social security number

Home address (no. and street) or P.O. box if mail is not delivered to your home Apt. no. Phone number **989-349-3050**

City, town or post office, state, and ZIP code. If you have a foreign address, see page 4 of the instructions. **MT. PLEASANT MI 48858**

A If the address shown above is different from that shown on your last return filed with the IRS, would you like us to change it in our records? ☐ Yes ☐ No

B Filing status. Be sure to complete this line. Note. You cannot change from joint to separate returns after the due date.

On original return ☒ Single ☐ Married filing jointly ☐ Married filing separately ☐ Head of household ☐ Qualifying widow(er)

On this return ☒ Single ☐ Married filing jointly ☐ Married filing separately ☐ Head of household* ☐ Qualifying widow(er)

* If the qualifying person is a child but not your dependent, see page 4 of the instructions.

Use Part II on the back to explain any changes

		A. Original amount or as previously adjusted (see page 4)	B. Net change—amount of increase or (decrease)—explain in Part II	C. Correct amount
Income and Deductions (see instructions)				
1	Adjusted gross income (see page 4)	1,779,813	656,254	2,436,067
2	Itemized deductions or standard deduction (see page 4)	5,450		5,450
3	Subtract line 2 from line 1	1,774,363	656,254	2,430,617
4	Exemptions. If changing, fill in Parts I and II on the back (see page 5)	2,333		2,333
5	Taxable income. Subtract line 4 from line 3	1,772,030	656,254	2,428,284
6	Tax (see page 5). Method used in col. C FEITW	268,157	97,253	365,410
7	Credits (see page 6)	328		328
8	Subtract line 7 from line 6. Enter the result but not less than zero	267,829	97,253	365,082
9	Other taxes (see page 6)	0		
10	Total tax. Add lines 8 and 9	267,829	97,253	365,082
Payments				
11	Federal income tax withheld and excess social security and tier 1 RRTA tax withheld. If changing, see page 6	0		
12	Estimated tax payments, including amount applied from prior year's return	0		
13	Earned income credit (EIC)	0		
14	Additional child tax credit from Form 8812	0		
15	Credits: Recovery rebate, federal telephone excise tax, or from Forms 2439, 5136, 5405, 8885, or 8801 (refundable credit only)	0		
16	Amount paid with request for extended time to file (see page 6)			
17	Amount of tax paid with original return plus additional tax paid after it was filed			0
18	Total payments. Add lines 11 through 17 in column C			

Refund or Amount You Owe

Note. Allow 8-12 weeks to process Form 1040X.

19 Overpayment, if any, as shown on original return or as previously adjusted by the IRS

20 Subtract line 19 from line 18 (see page 6)

21 Amount you owe. If line 10, column C, is more than line 20, enter the difference and see page 6

22 If line 10, column C, is less than line 20, enter the difference

23 Amount of line 22 you want refunded to you

24 Amount of line 22 you want applied to your estimated tax

Sign Here

Joint return? See page 4. Keep a copy for your records.

Under penalties of perjury, I declare that I have filed an original return and that I have examined this amended return, including accompanying statements, and to the best of my knowledge and belief, this amended return is true, correct, and complete. Declaration of preparer (other than taxpayer) is based on all information of which the preparer has any knowledge.

Your signature [REDACTED] Date **1/16/12**

Spouse's signature, if a joint return, both must sign [REDACTED]

Paid Preparer's Use Only

Preparer's signature [REDACTED] Date **1/10/12** Check if self-employed ☐

Firm's name (or yours if self-employed), address, and ZIP code **ANDREWS HOOPER PAVLIK PLC 5300 GRATIOT RD SAGINAW MI 48638-6035**

Preparer's SSN or PTIN **P00044903** EIN [REDACTED] Phone no. **989-497-5300**

For Paperwork Reduction Act Notice, see page 8 of instructions.

Form 1040X (Rev. 2-2009)

DAA

00302

JAMES D PIERON, JR.

Form 1040X (Rev. 2-2009)

Page **2****Exemptions.** See Form 1040 or 1040A instructions.

Complete this part only if you are:

- Increasing or decreasing the number of exemptions claimed on line 6d of the return you are amending, or
- Increasing or decreasing the exemption amount for housing individuals displaced by Hurricane Katrina or for housing Midwestern displaced individuals.

A. Original number of exemptions reported or as previously adjusted**B. Net change****C. Correct number of exemptions**

25	Yourself and spouse	25																		
	Caution. If someone can claim you as a dependent, you cannot claim an exemption for yourself.																			
26	Your dependent children who lived with you	26																		
27	Your dependent children who did not live with you due to divorce or separation	27																		
28	Other dependents	28																		
29	Total number of exemptions. Add lines 25 through 28	29																		
30	Multiply the number of exemptions claimed on line 29 by the amount below for the tax year you are amending. Enter the result here.																			
	<table border="1"> <thead> <tr> <th>Tax year</th> <th>Exemption amount</th> <th>But see the instructions for line 4 on page 5 if the amount on line 1 is over:</th> </tr> </thead> <tbody> <tr> <td>2008</td> <td>\$3,500</td> <td>\$119,975</td> </tr> <tr> <td>2007</td> <td>3,400</td> <td>117,300</td> </tr> <tr> <td>2006</td> <td>3,300</td> <td>112,875</td> </tr> <tr> <td>2005</td> <td>3,200</td> <td>109,475</td> </tr> </tbody> </table>	Tax year	Exemption amount	But see the instructions for line 4 on page 5 if the amount on line 1 is over:	2008	\$3,500	\$119,975	2007	3,400	117,300	2006	3,300	112,875	2005	3,200	109,475	30			
Tax year	Exemption amount	But see the instructions for line 4 on page 5 if the amount on line 1 is over:																		
2008	\$3,500	\$119,975																		
2007	3,400	117,300																		
2006	3,300	112,875																		
2005	3,200	109,475																		
31	If you are claiming an exemption amount for housing individuals displaced by Hurricane Katrina, enter the amount from Form 8914, line 2 for 2006. If you are claiming an exemption amount for housing Midwestern displaced individuals, enter the amount from the 2008 Form 8914, line 2. (See instructions for line 4). Otherwise enter -0-	31																		
32	Add lines 30 and 31. Enter the result here and on line 4	32																		

33 Dependents (children and other) not claimed on original (or adjusted) return:

No. of children on 33 who:

(a) First name	Last name	(b) Dependent's social security number	(c) Dependent's relationship to you	(d) <input checked="" type="checkbox"/> if qualifying child for child tax credit (see page 7)	<input type="checkbox"/> lived with you <input type="checkbox"/> did not live with you due to divorce or separation (see page 7) Dependents on 33 not entered above

Explanation of Changes

Enter the line number from the front of the form for each item you are changing and give the reason for each change. Attach only the supporting forms and schedules for the items changed. If you do not attach the required information, your Form 1040X may be returned. Be sure to include your name and social security number on any attachments.

If the change relates to a net operating loss carryback or a general business credit carryback, attach the schedule or form that shows the year in which the loss or credit occurred. See pages 2 and 3 of the instructions. Also, check here ☐

AMENDING RETURN TO CORRECT AND INCREASE SCH D CAPITAL GAIN IN THE AMOUNT OF \$7,664,905. ALSO AMENDING TO FILE FORM 4684 TO CLAIM LOSSES THAT WERE A DIRECT RESULT OF INDICTMENT OF THE INDIVIDUAL THAT PURCHASED 35% INTEREST IN JDFX COMPANY. CLAIMING LOSSES IN THE AMOUNT OF \$7,008,651 FOR A NET AGI INCREASE IN THE AMOUNT OF \$656,254.

Presidential Election Campaign Fund. Checking below will not increase your tax or reduce your refund.If you did not previously want \$3 to go to the fund but now want to, check here ☐If a joint return and your spouse did not previously want \$3 to go to the fund but now wants to, check here ☐

DAA

Form 1040X (Rev. 2-2009)

00303

Form 1040 Department of the Treasury—Internal Revenue Service **2008** (99) IRS Use Only—Do not write or staple in this space.

Label (See instructions on page 14.) Use the IRS label. Otherwise, please print or type. **Presidential Election Campaign** Check here if you, or your spouse if filing jointly, want \$3 to go to this fund (see page 14) ☐ You ☐ Spouse

Filing Status 1 ☒ Single 2 ☐ Married filing jointly (even if only one had income) 3 ☐ Married filing separately. Enter spouse's SSN above and full name here. 4 ☐ Head of household (with qualifying person). (See page 15.) If the qualifying person is a child but not your dependent, enter this child's name here. 5 ☐ Qualifying widow(er) with dependent child (see page 16)

Exemptions 6a ☒ Yourself. If someone can claim you as a dependent, do not check box 6a 6b ☐ Spouse 6c Dependents: (1) First name Last name (2) Dependent's social security number (3) Dependent's relationship to you (4) ☐ if qual. child for child tax cr. (see page 17) ☐ lived with you ☐ did not live with you due to divorce or separation (see page 18) 6d Total number of exemptions claimed 1

Income 7 Wages, salaries, tips, etc. Attach Form(s) W-2 7 90,995 8a Taxable interest. Attach Schedule B if required 8a 8b Tax-exempt interest. Do not include on line 8a 8b 9a Ordinary dividends. Attach Schedule B if required 9a 9b Qualified dividends (see page 21) 9b 10 Taxable refunds, credits, or offsets of state and local income taxes (see page 22) 10 11 Alimony received 11 12 Business income or (loss). Attach Schedule C or C-EZ 12 0 13 Capital gain or (loss). Attach Schedule D if required. If not required, check here ☐ 13 9,441,323 14 Other gains or (losses). Attach Form 4797 F4684 14 -7,008,651 15a IRA distributions 15a 15b Taxable amount (see page 23) 15b 16a Pensions and annuities 16a 16b Taxable amount (see page 24) 16b 17 Rental real estate, royalties, partnerships, S corporations, trusts, etc. Attach Schedule E 17 18 Farm income or (loss). Attach Schedule F 18 19 Unemployment compensation 19 20a Social security benefits 20a 20b Taxable amount (see page 26) 20b 21 Other income. List type and amount (see page 25) FORM 2555 21 -87,600 22 Add the amounts in the far right column for lines 7 through 21. This is your total income 22 2,436,067

Adjusted Gross Income 23 Educator expenses (see page 28) 23 24 Certain business expenses of reservists, performing artists, and fee-basis government officials. Attach Form 2106 or 2106-EZ 24 25 Health savings account deduction. Attach Form 8889 25 26 Moving expenses. Attach Form 3903 26 27 One-half of self-employment tax. Attach Schedule SE 27 28 Self-employed SEP, SIMPLE, and qualified plans 28 29 Self-employed health insurance deduction (see page 29) 29 30 Penalty on early withdrawal of savings 30 31a Alimony paid b Recipient's SSN ☐ 31a 32 IRA deduction (see page 30) 32 33 Student loan interest deduction (see page 33) 33 34 Tuition and fees deduction. Attach Form 8917 34 35 Domestic production activities deduction. Attach Form 8903 35 36 Add lines 23 through 31a and 32 through 35 36 37 Subtract line 36 from line 22. This is your adjusted gross income 37 2,436,067

For Disclosure, Privacy Act, and Paperwork Reduction Act Notice, see page 88. **AS AMENDED** Form 1040 (2008)

Form 1040 (2008) **JAMES D PIERON, JR.**

Page 2

Tax and Credits**Standard Deduction for—**

• People who checked any box on line 39a, 39b, or 39c or who can be claimed as a dependent, see page 34.

• All others:
Single or Married filing separately, \$5,450

Married filing jointly or Qualifying widow(er), \$10,900

Head of household, \$8,000

38	Amount from line 37 (adjusted gross income)	38	2,436,067
39a	Check <input type="checkbox"/> You were born before January 2, 1944, <input type="checkbox"/> Blind. <input type="checkbox"/> Spouse was born before January 2, 1944, <input type="checkbox"/> Blind. Total boxes checked ▶ 39a		
b	If your spouse itemizes on a separate return or you were a dual-status alien, see page 34 and check here ▶ 39b		
c	Check if standard deduction includes real estate taxes or disaster loss (see page 34) ▶ 39c		
40	Itemized deductions (from Schedule A) or your standard deduction (see left margin)	40	5,450
41	Subtract line 40 from line 38	41	2,430,617
42	If line 38 is over \$119,975, or you provided housing to a Midwestern displaced individual, see page 36. Otherwise, multiply \$3,500 by the total number of exemptions claimed on line 6d	42	2,333
43	Taxable income. Subtract line 42 from line 41. If line 42 is more than line 41, enter -0-	43	2,428,284
44	Tax (see page 36). Check if any tax is from <input type="checkbox"/> Form(s) 8814b <input type="checkbox"/> Form 4972	44	364,243
45	Alternative minimum tax (see page 39). Attach Form 6251	45	1,167
46	Add lines 44 and 45	46	365,410
47	Foreign tax credit. Attach Form 1116 if required	47	328
48	Credit for child and dependent care expenses. Attach Form 2441	48	
49	Credit for the elderly or the disabled. Attach Schedule R	49	
50	Education credits. Attach Form 8863	50	
51	Retirement savings contributions credit. Attach Form 8880	51	
52	Child tax credit (see page 42). Attach Form 8901 if required	52	
53	Credits from Form <input type="checkbox"/> 8396 b <input type="checkbox"/> 8839 c <input type="checkbox"/> 5695	53	
54	Other credits from Form <input type="checkbox"/> 3800 b <input type="checkbox"/> 8801 c <input type="checkbox"/>	54	
55	Add lines 47 through 54. These are your total credits	55	328
56	Subtract line 55 from line 46. If line 55 is more than line 46, enter -0-	56	365,082
57	Self-employment tax. Attach Schedule SE	57	
58	Unreported social security and Medicare tax from Form: a <input type="checkbox"/> 4137 b <input type="checkbox"/> 8919	58	
59	Additional tax on IRAs, other qualified retirement plans, etc. Attach Form 5329 if required	59	
60	Additional taxes <input type="checkbox"/> AEIC payments <input type="checkbox"/> Household employment taxes. Attach Schedule H	60	
61	Add lines 56 through 60. This is your total tax	61	365,082

Other Taxes**Payments**

If you have a qualifying child, attach Schedule EIC.

62	Federal income tax withheld from Forms W-2 and 1099	62	
63	2008 estimated tax payments and amount applied from 2007 return	63	
64a	Earned income credit (EIC)	64a	
b	Nontaxable combat pay election <input type="checkbox"/> 64b		
65	Excess social security and tier 1 RRTA tax withheld (see page 61)	65	
66	Additional child tax credit. Attach Form 8812	66	
67	Amount paid with request for extension to file (see page 61)	67	
68	Credits from Form: a <input type="checkbox"/> 2439 b <input type="checkbox"/> 4136 c <input type="checkbox"/> 8801 d <input type="checkbox"/> 8885	68	
69	First-time homebuyer credit. Attach Form 5405	69	
70	Recovery rebate credit (see worksheet on pages 62 and 63)	70	
71	Add lines 62 through 70. These are your total payments	71	

Refund

Direct deposit? See page 63 and fill in 73b, 73c, and 73d, or Form 8888.

72	If line 71 is more than line 61, subtract line 61 from line 71. This is the amount you overpaid	72	
73a	Amount of line 72 you want refunded to you. If Form 8888 is attached, check here <input type="checkbox"/>	73a	
b	Routing number	c	Type: <input type="checkbox"/> Checking <input type="checkbox"/> Savings
d	Account number		
74	Amount of line 72 you want applied to your 2009 estimated tax	74	

Amount You Owe

75	Amount you owe. Subtract line 71 from line 61. For details on how to pay, see page 65	75	365,082
76	Estimated tax penalty (see page 65)	76	

Third Party Designee

Do you want to allow another person to discuss this return with the IRS (see page 66)? ☒ Yes. Complete the following. ☐ No

Designee's name **PREPARER** Personal identification number (PIN) Phone no.

Sign Here

Joint return? See page 15.

Keep a copy for your records.

Under penalties of perjury, I declare that I have examined this return and accompanying schedules and statements, and to the best of my knowledge and belief, they are true, correct, and complete. Declaration of preparer (other than taxpayer) is based on all information of which preparer has any knowledge.

Your signature	Date	Your occupation SALES MANAGER	Daytime phone number
Spouse's signature. If a joint return, both must sign.	Date	Spouse's occupation	

Paid**Preparer's Use Only**

Preparer's signature	Date	Check if self-employed <input type="checkbox"/>	Preparer's SSN or PTIN P00044903
Firm's name (or yours if self-employed), address, and ZIP code	ANDREWS HOOPER PAVLIK PLC 5300 GRATIOT RD SAGINAW MI 48638-6035		EIN <input type="text"/> Phone no. 989-497-5300

AS AMENDED

Form 1040 (2008)

SCHEDULE D
(Form 1040)Department of the Treasury
Internal Revenue Service (99)**Capital Gains and Losses**

▶ Attach to Form 1040 or Form 1040NR. ▶ See instructions for Schedule D (Form 1040).

▶ Use Schedule D-1 to list additional transactions for lines 1 and 8.

OMB No. 1545-0074

2008Attachment
Sequence No. **12**

Name(s) shown on return

JAMES D PIERON, JR.

Your social security number

Part I Short-Term Capital Gains and Losses—Assets Held One Year or Less

(a) Description of property (Example: 100 sh. XYZ Co.)	(b) Date acquired (Mo., day, yr.)	(c) Date sold (Mo., day, yr.)	(d) Sales price (see page D-7 of the instructions)	(e) Cost or other basis (see page D-7 of the instructions)	(f) Gain or (loss) Subtract (e) from (d)
1					
2	Enter your short-term totals, if any, from Schedule D-1, line 2		2		
3	Total short-term sales price amounts. Add lines 1 and 2 in column (d)		3		
4	Short-term gain from Form 6252 and short-term gain or (loss) from Forms 4684, 6781, and 8824				4 178,590
5	Net short-term gain or (loss) from partnerships, S corporations, estates, and trusts from Schedule(s) K-1				5
6	Short-term capital loss carryover. Enter the amount, if any, from line 8 of your Capital Loss Carryover Worksheet on page D-7 of the instructions				6 295,024
7	Net short-term capital gain or (loss). Combine lines 1 through 6 in column (f)				7 -116,434

Part II Long-Term Capital Gains and Losses—Assets Held More Than One Year

(a) Description of property (Example: 100 sh. XYZ Co.)	(b) Date acquired (Mo., day, yr.)	(c) Date sold (Mo., day, yr.)	(d) Sales price (see page D-7 of the instructions)	(e) Cost or other basis (see page D-7 of the instructions)	(f) Gain or (loss) Subtract (e) from (d)
8 JDFX	1/14/04	2/04/08	10,000,000	710,129	9,289,871
9	Enter your long-term totals, if any, from Schedule D-1, line 9		9		
10	Total long-term sales price amounts. Add lines 8 and 9 in column (d)		10 10,000,000		
11	Gain from Form 4797, Part I; long-term gain from Forms 2439 and 6252; and long-term gain or (loss) from Forms 4684, 6781, and 8824				11 267,886
12	Net long-term gain or (loss) from partnerships, S corporations, estates, and trusts from Schedule(s) K-1				12
13	Capital gain distributions. See page D-2 of the instructions				13
14	Long-term capital loss carryover. Enter the amount, if any, from line 13 of your Capital Loss Carryover Worksheet on page D-7 of the instructions				14
15	Net long-term capital gain or (loss). Combine lines 8 through 14 in column (f). Then go to Part III on the back				15 9,557,757

For Paperwork Reduction Act Notice, see Form 1040 or Form 1040NR instructions.

Schedule D (Form 1040) 2008

AS AMENDED

JAMES D PIERON, JR.

Schedule D (Form 1040) 2008

Page 2

Summary

16 Combine lines 7 and 15 and enter the result	16	9,441,323
<p>If line 16 is:</p> <ul style="list-style-type: none"> • A gain, enter the amount from line 16 on Form 1040, line 13, or Form 1040NR, line 14. Then go to line 17 below. • A loss, skip lines 17 through 20 below. Then go to line 21. Also be sure to complete line 22. • Zero, skip lines 17 through 21 below and enter -0- on Form 1040, line 13, or Form 1040NR, line 14. Then go to line 22. 		
17 Are lines 15 and 16 both gains?		
<input checked="" type="checkbox"/> Yes. Go to line 18. <input type="checkbox"/> No. Skip lines 18 through 21, and go to line 22.		
18 Enter the amount, if any, from line 7 of the 28% Rate Gain Worksheet on page D-8 of the instructions	18	
19 Enter the amount, if any, from line 18 of the Unrecaptured Section 1250 Gain Worksheet on page D-9 of the instructions	19	
20 Are lines 18 and 19 both zero or blank?		
<input checked="" type="checkbox"/> Yes. Complete Form 1040 through line 43, or Form 1040NR through line 40. Then complete the Qualified Dividends and Capital Gain Tax Worksheet on page 38 of the Instructions for Form 1040 (or in the Instructions for Form 1040NR). Do not complete lines 21 and 22 below. <input type="checkbox"/> No. Complete Form 1040 through line 43, or Form 1040NR through line 40. Then complete the Schedule D Tax Worksheet on page D-10 of the instructions. Do not complete lines 21 and 22 below.		
21 If line 16 is a loss, enter here and on Form 1040, line 13, or Form 1040NR, line 14, the smaller of:	21	
<ul style="list-style-type: none"> • The loss on line 16 or • (\$3,000), or if married filing separately, (\$1,500) 		
<p>Note. When figuring which amount is smaller, treat both amounts as positive numbers.</p>		
22 Do you have qualified dividends on Form 1040, line 9b, or Form 1040NR, line 10b?		
<input type="checkbox"/> Yes. Complete Form 1040 through line 43, or Form 1040NR through line 40. Then complete the Qualified Dividends and Capital Gain Tax Worksheet on page 38 of the Instructions for Form 1040 (or in the Instructions for Form 1040NR). <input type="checkbox"/> No. Complete the rest of Form 1040 or Form 1040NR.		

Schedule D (Form 1040) 2008

Form 1116 Department of the Treasury Internal Revenue Service (99)	Foreign Tax Credit (Individual, Estate, or Trust) ▶ Attach to Form 1040, 1040NR, 1041, or 990-T. ▶ See separate instructions.	OMB No. 1545-0121 <div style="font-size: 24pt; font-weight: bold;">2008</div> Attachment Sequence No. 19
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Name

Identifying number as shown on page 1 of your tax return

JAMES D PIERON, JR.

Use a separate Form 1116 for each category of income listed below. See **Categories of Income** beginning on page 3 of the instructions. Check only one box on each Form 1116. Report all amounts in U.S. dollars except where specified in Part II below.

- | | | |
|---|--|---|
| a <input type="checkbox"/> Passive category income | c <input type="checkbox"/> Section 901(j) income | e <input type="checkbox"/> Lump-sum distributions |
| b <input checked="" type="checkbox"/> General category income | d <input type="checkbox"/> Certain income re-sourced by treaty | |

f Resident of (name of country) ▶ UNITED STATES

Note: If you paid taxes to only one foreign country or U.S. possession, use column A in Part I and line A in Part II. If you paid taxes to more than one foreign country or U.S. possession, use a separate column and line for each country or possession.

Part I Taxable Income or Loss From Sources Outside the United States (for Category Checked Above)

g Enter the name of the foreign country or U.S. possession ▶	Foreign Country or U.S. Possession			Total (Add cols. A, B, and C.)
	A	B	C	
1a Gross income from sources within country shown above and of the type checked above (see page 13 of the instructions): GENERAL	90,995			90,995
b Check if line 1a is compensation for personal services as an employee, your total compensation from all sources is \$250,000 or more, and you used an alternative basis to determine its source (see instructions) ▶ <input type="checkbox"/>				
Deductions and losses (Caution: See page 14 of the instructions):				
2 Expenses definitely related to the income on line 1a (attach statement)				
3 Pro rata share of other deductions not definitely related:				
a Certain itemized deductions or standard deduction (see instructions)	5,450			
b Other ded. (attach stmt.)				
c Add lines 3a and 3b	5,450			
d Gross foreign source income (see instructions)	90,995			
e Gross income from all sources (see instructions)	9,827,342			
f Divide line 3d by line 3e (see instructions)	0.0093			
g Multiply line 3c by line 3f	50			
4 Pro rata share of interest expense (see instructions):				
a Home mortgage interest (use worksheet on page 14 of the instructions)				
b Other interest expense				
5 Losses from foreign sources				
6 Add lines 2, 3g, 4a, 4b, and 5	50			50
7 Subtract line 6 from line 1a. Enter the result here and on line 14, page 2				90,945

Part II Foreign Taxes Paid or Accrued (see page 14 of the instructions)

Country	Foreign taxes paid or accrued										(s) Total foreign taxes paid or accrued (add cols. (e) through (r))
	In foreign currency					In U.S. dollars					
	Taxes withheld at source on:				(n) Other foreign taxes paid or accrued	Taxes withheld at source on:			(r) Other foreign taxes paid or accrued		
	(h) Paid (i) Accrued	(j) Date paid or accrued	(k) Dividends	(l) Rents and royalties		(m) Interest	(o) Dividends	(p) Rents and royalties		(q) Interest	
A	<input checked="" type="checkbox"/>	12/31/08				9,283				8,799	8,799
B											
C											
8	Add lines A through C, column(s). Enter the total here and on line 9, page 2										8,799

For Paperwork Reduction Act Notice, see page 19 of the instructions.

AS AMENDED

Form 1116 (2008)

JAMES D PIERON, JR.

Form 1116 (2008)

Page 2

Figuring the Credit

9	Enter the amount from line 8. These are your total foreign taxes paid or accrued for the category of income checked above Part I	9	8,799	
10	Carryback or carryover (attach detailed computation)	10		
11	Add lines 9 and 10	11	8,799	
12	Reduction in foreign taxes (see pages 15 and 16 of the instructions) SEE STMT 1	12	8,471	
13	Subtract line 12 from line 11. This is the total amount of foreign taxes available for credit (see instructions)	13		328
14	Enter the amount from line 7. This is your taxable income or (loss) from sources outside the United States (before adjustments) for the category of income checked above Part I (see page 16 of the instructions)	14	90,945	
15	Adjustments to line 14 (see pages 16 and 17 of the instructions)	15		
16	Combine the amounts on lines 14 and 15. This is your net foreign source taxable income. (If the result is zero or less, you have no foreign tax credit for the category of income you checked above Part I. Skip lines 17 through 21. However, if you are filing more than one Form 1116, you must complete line 19.)	16	90,945	
17	Individuals: Enter the amount from Form 1040, line 41 (minus any amount on Form 8914, line 2). If you are a nonresident alien, enter the amount from Form 1040NR, line 38 (minus any amount on Form 8914, line 2). Estates and trusts: Enter your taxable income without the deduction for your exemption Caution: If you figured your tax using the lower rates on qualified dividends or capital gains, see page 17 of the instructions.	17	2,430,617	
18	Divide line 16 by line 17. If line 16 is more than line 17, enter "1"	18		0.0374
19	Individuals: Enter the amount from Form 1040, line 44. If you are a nonresident alien, enter the amount from Form 1040NR, line 41. Estates and trusts: Enter the amount from Form 1041, Schedule G, line 1a, or the total of Form 990-T, lines 36 and 37 Caution: If you are completing line 19 for separate category a (lump-sum distributions), see page 19 of the instructions.	19		364,243
20	Multiply line 19 by line 18 (maximum amount of credit)	20		13,629
21	Enter the smaller of line 13 or line 20. If this is the only Form 1116 you are filing, skip lines 22 through 26 and enter this amount on line 27. Otherwise, complete the appropriate line in Part IV (see page 19 of the instructions)	21		328

Summary of Credits From Separate Parts III (see page 19 of the instructions)

22	Credit for taxes on passive category income	22		
23	Credit for taxes on general category income	23		
24	Credit for taxes on certain income re-sourced by treaty	24		
25	Credit for taxes on lump-sum distributions	25		
26	Add lines 22 through 25	26		
27	Enter the smaller of line 19 or line 26	27		328
28	Reduction of credit for international boycott operations. See instructions for line 12 beginning on page 15	28		
29	Subtract line 28 from line 27. This is your foreign tax credit. Enter here and on Form 1040, line 47; Form 1040NR, line 44; Form 1041, Schedule G, line 2a; or Form 990-T, line 40a	29		328

Form 1116 (2008)

AS AMENDED

Form **1116****ALT. MIN. TAX
Foreign Tax Credit**

(Individual, Estate, or Trust)

▶ Attach to Form 1040, 1040NR, 1041, or 990-T.

▶ See separate instructions.

OMB No. 1545-0121

2008Attachment
Sequence No. **19**Department of the Treasury
Internal Revenue Service (99)

Name

Identifying number as shown on page 1 of your tax return

JAMES D PIERON, JR.Use a separate Form 1116 for each category of income listed below. See **Categories of Income** beginning on page 3 of the instructions. Check only one box on each Form 1116. Report all amounts in U.S. dollars except where specified in Part II below.

- a ☐ Passive category income c ☐ Section 901(j) income e ☐ Lump-sum distributions
b ☒ General category income d ☐ Certain income re-sourced by treaty

f Resident of (name of country) ▶ **UNITED STATES**

Note: If you paid taxes to only one foreign country or U.S. possession, use column A in Part I and line A in Part II. If you paid taxes to more than one foreign country or U.S. possession, use a separate column and line for each country or possession.

Taxable Income or Loss From Sources Outside the United States (for Category Checked Above)

g Enter the name of the foreign country or U.S. possession ▶	Foreign Country or U.S. Possession			Total (Add cols. A, B, and C.)
	A	B	C	
SWITZERLAND				
1a Gross income from sources within country shown above and of the type checked above (see page 13 of the instructions): GENERAL	90,995			90,995
b Check if line 1a is compensation for personal services as an employee, your total compensation from all sources is \$250,000 or more, and you used an alternative basis to determine its source (see instructions) ▶ <input type="checkbox"/>				
Deductions and losses (Caution: See pages 13 and 14 of the instructions):				
2 Expenses definitely related to the income on line 1a (attach statement)				
3 Pro rata share of other deductions not definitely related:				
a Certain itemized deductions or standard deduction (see instructions)	5,450			
b Other ded. (attach stmt.)				
c Add lines 3a and 3b	5,450			
d Gross foreign source income (see instructions)	90,995			
e Gross income from all sources (see instructions)	9,827,342			
f Divide line 3d by line 3e (see instructions)	0.0093			
g Multiply line 3c by line 3f	50			
4 Pro rata share of interest expense (see instructions)				
a Home mortgage interest (use worksheet on page 14 of the instructions)				
b Other interest expense				
5 Losses from foreign sources				
6 Add lines 2, 3g, 4a, 4b, and 5	50			50
7 Subtract line 6 from line 1a. Enter the result here and on line 14, page 2				90,945

Foreign Taxes Paid or Accrued (see page 14 of the instructions)

Country	Credit is claimed for taxes (you must check one) (h) <input checked="" type="checkbox"/> Paid (i) <input type="checkbox"/> Accrued	Foreign taxes paid or accrued								
		In foreign currency				In U.S. dollars				
		Taxes withheld at source on:				Taxes withheld at source on:				
		(j) Date paid or accrued	(k) Dividends	(l) Rents and royalties	(m) Interest	(n) Other foreign taxes paid or accrued	(o) Dividends	(p) Rents and royalties	(q) Interest	(r) Other foreign taxes paid or accrued
A	12/31/08				9,283				8,799	8,799
B										
C										
8	Add lines A through C, column(s). Enter the total here and on line 9, page 2									8,799

For Paperwork Reduction Act Notice, see page 19 of the instructions.

Form **1116** (2008)**AS AMENDED**

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00310

ALT. MIN. TAX

JAMES D PIERON, JR.

Form 1116 (2008)

Page 2

Figuring the Credit

9	Enter the amount from line 8. These are your total foreign taxes paid or accrued for the category of income checked above Part I	9	8,799	
10	Carryback or carryover (attach detailed computation)	10		
11	Add lines 9 and 10	11	8,799	
12	Reduction in foreign taxes (see pages 15 and 16 of the instructions) SEE STMT 2	12	8,471	
13	Subtract line 12 from line 11. This is the total amount of foreign taxes available for credit (see instructions)	13		328
14	Enter the amount from line 7. This is your taxable income or (loss) from sources outside the United States (before adjustments) for the category of income checked above Part I (see page 16 of the instructions)	14	90,945	
15	Adjustments to line 14 (see pages 16 and 17 of the instructions)	15		
16	Combine the amounts on lines 14 and 15. This is your net foreign source taxable income. (If the result is zero or less, you have no foreign tax credit for the category of income you checked above Part I. Skip lines 17 through 21. However, if you are filing more than one Form 1116, you must complete line 19.)	16	90,945	
17	Individuals: Enter the amount from Form 1040, line 41 (minus any amount on Form 8914, line 2). If you are a nonresident alien, enter the amount from Form 1040NR, line 38 (minus any amount on Form 8914, line 2). Estates and trusts: Enter your taxable income without the deduction for your exemption Caution: If you figured your tax using the lower rates on qualified dividends or capital gains, see page 17 of the instructions.	17	2,436,067	
18	Divide line 16 by line 17. If line 16 is more than line 17, enter "1"	18		0.0373
19	Individuals: Enter the amount from Form 1040, line 44. If you are a nonresident alien, enter the amount from Form 1040NR, line 41. Estates and trusts: Enter the amount from Form 1041, Schedule G, line 1a, or the total of Form 990-T, lines 36 and 37 Caution: If you are completing line 19 for separate category e (lump-sum distributions), see page 19 of the instructions.	19		365,410
20	Multiply line 19 by line 18 (maximum amount of credit)	20		13,642
21	Enter the smaller of line 13 or line 20. If this is the only Form 1116 you are filing, skip lines 22 through 26 and enter this amount on line 27. Otherwise, complete the appropriate line in Part IV (see page 19 of the instructions)	21		328
Summary of Credits From Separate Parts III (see page 19 of the instructions)				
22	Credit for taxes on passive category income	22		
23	Credit for taxes on general category income	23		
24	Credit for taxes on certain income re-sourced by treaty	24		
25	Credit for taxes on lump-sum distributions	25		
26	Add lines 22 through 25	26		
27	Enter the smaller of line 19 or line 26	27		328
28	Reduction of credit for international boycott operations. See instructions for line 12 beginning on page 15	28		
29	Subtract line 28 from line 27. This is your foreign tax credit. Enter here and on Form 1040, line 47; Form 1040NR, line 44; Form 1041, Schedule G, line 2a; or Form 990-T, line 40a	29		328

Form 1116 (2008)

AS AMENDED

Form 4684 (2008)

Attachment Sequence No. 26

PAGE 1 OF 1

Page 2

Name(s) shown on tax return. Do not enter name and identifying number if shown on other side.

Identifying number

JAMES D PIERON, JR.**SECTION B—Business and Income-Producing Property THEFT LOSS OF INVESTMENT****Casualty or Theft Gain or Loss (Use a separate Part I for each casualty or theft.)**

25 Description of properties (show type, location, and date acquired for each property). Use a separate line for each property lost or damaged from the same casualty or theft.

Property A **THEFT LOSS OF INVESTMENT****1/01/07**

Property B

Property C

Property D

Properties

		A	B	C	D
26	Cost or adjusted basis of each property	26 7,008,651			
27	Insurance or other reimbursement (whether or not you filed a claim). See the instructions for line 3. Note: If line 26 is more than line 27, skip line 28.	27			
28	Gain from casualty or theft. If line 27 is more than line 26, enter the difference here and on line 35 or line 40, column (c), except as provided in the instructions for line 39. Also, skip lines 29 through 33 for that column. See the instructions for line 39. If line 27 includes insurance or other reimbursement you did not claim, or you received payment for your loss in a later tax year.	28			
29	Fair market value before casualty or theft	29 7,008,651			
30	Fair market value after casualty or theft	30 0			
31	Subtract line 30 from line 29	31 7,008,651			
32	Enter the smaller of line 26 or line 31. Note: If the property was totally destroyed by casualty or lost from theft, enter on line 32 the amount from line 26.	32 7,008,651			
33	Subtract line 27 from line 32. If zero or less, enter -0-	33 7,008,651			
34	Casualty or theft loss. Add the amounts on line 33. Enter the total here and on line 35 or line 40 (see instructions)	34			7,008,651

Summary of Gains and Losses (from separate Parts I)

(a) Identify casualty or theft

(b) Losses from casualties or thefts

(i) Trade, business, rental or royalty property

(ii) Income-producing and employee property

(c) Gains from casualties or thefts includible in income

Casualty or Theft of Property Held One Year or Less

35				
36	Totals. Add the amounts on line 35	36		
37	Combine line 36, columns (b)(i) and (c). Enter the net gain or (loss) here and on Form 4797, line 14. If Form 4797 is not otherwise required, see instructions	37		0
38	Enter the amount from line 36, column (b)(ii) here. Individuals, enter the amount from income-producing property on Schedule A (Form 1040), line 28, or Form 1040NR, Schedule A, line 16, and enter the amount from property used as an employee on Schedule A (Form 1040), line 23, or Form 1040NR, Schedule A, line 11. Estates and trusts, partnerships, and S corporations, see instructions	38		

Casualty or Theft of Property Held More Than One Year

39	Casualty or theft gains from Form 4797, line 32	39		0
40	THEFT LOSS OF INVESTMENT		7,008,651	
41	Total losses. Add amounts on line 40, columns (b)(i) and (b)(ii)	41	7,008,651	
42	Total gains. Add lines 39 and 40, column (c)	42		
43	Add amounts on line 41, columns (b)(i) and (b)(ii)	43		-7,008,651
44	If the loss on line 43 is more than the gain on line 42: a Combine line 41, column (b)(i) and line 42, and enter the net gain or (loss) here. Partnerships (except electing large partnerships) and S corporations, see the note below. All others, enter this amount on Form 4797, line 14. If Form 4797 is not otherwise required, see instructions b Enter the amount from line 41, column (b)(ii) here. Individuals, enter the amount from income-producing property on Schedule A (Form 1040), line 28, or Form 1040NR, Schedule A, line 16, and enter the amount from property used as an employee on Schedule A (Form 1040), line 23, or Form 1040NR, Schedule A, line 11. Estates and trusts, enter on the "Other deductions" line of your tax return. Partnerships (except electing large partnerships) and S corporations, see the note below. Electing large partnerships, enter on Form 1065-B, Part II, line 44b			7,008,651
45	If the loss on line 43 is less than or equal to the gain on line 42, combine lines 42 and 43 and enter here. Partnerships (except electing large partnerships), see the note below. All others, enter this amount on Form 4797, line 3	45		
Note: Partnerships, enter the amount from line 44a, 44b, or line 45 on Form 1065, Schedule K, line 11. S corporations, enter the amount from line 44a or 44b on Form 1120S, Schedule K, line 10.				

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AS AMENDED

Form 4684 (2008)

00312

Form **6251****Alternative Minimum Tax—Individuals**

OMB No. 1545-0074

2008Department of the Treasury
Internal Revenue Service (99)

▶ See separate instructions.

▶ Attach to Form 1040 or Form 1040NR.

Attachment
Sequence No. **32**

Name(s) shown on Form 1040 or Form 1040NR

JAMES D PIERON, JR.

Your social security number

Alternative Minimum Taxable Income (See instructions for how to complete each line.)

1	If filing Schedule A (Form 1040), enter the amount from Form 1040, line 41 (minus any amount on Form 8914, line 2), and go to line 2. Otherwise, enter the amount from Form 1040, line 38 (minus any amount on Form 8914, line 2), and go to line 7. (If less than zero, enter as a negative amount.)	1	2,436,067
2	Medical and dental. Enter the smaller of Schedule A (Form 1040), line 4, or 2.5% (.025) of Form 1040, line 38. If zero or less, enter -0-		
3	Taxes from Schedule A (Form 1040), line 9	3	
4	Enter the home mortgage interest adjustment, if any, from line 6 of the worksheet on page 2 of the instructions	4	
5	Miscellaneous deductions from Schedule A (Form 1040), line 27	5	
6	If Form 1040, line 38, is over \$159,950 (over \$79,975 if married filing separately), enter the amount from line 11 of the Itemized Deductions Worksheet on page A-10 of the instructions for Schedule A (Form 1040)	6	
7	If claiming the standard deduction, enter any amount from Form 4684, line 18a, as a negative amount	7	
8	Tax refund from Form 1040, line 10 or line 21	8	
9	Investment interest expense (difference between regular tax and AMT)	9	
10	Depletion (difference between regular tax and AMT)	10	
11	Net operating loss deduction from Form 1040, line 21. Enter as a positive amount	11	
12	Interest from specified private activity bonds exempt from the regular tax	12	
13	Qualified small business stock (7% of gain excluded under section 1202)	13	
14	Exercise of incentive stock options (excess of AMT income over regular tax income)	14	
15	Estates and trusts (amount from Schedule K-1 (Form 1041), box 12, code A)	15	
16	Electing large partnerships (amount from Schedule K-1 (Form 1065-B), box 6)	16	
17	Disposition of property (difference between AMT and regular tax gain or loss)	17	
18	Depreciation on assets placed in service after 1986 (difference between regular tax and AMT)	18	
19	Passive activities (difference between AMT and regular tax income or loss)	19	
20	Loss limitations (difference between AMT and regular tax income or loss)	20	0
21	Circulation costs (difference between regular tax and AMT)	21	
22	Long-term contracts (difference between AMT and regular tax income)	22	
23	Mining costs (difference between regular tax and AMT)	23	
24	Research and experimental costs (difference between regular tax and AMT)	24	
25	Income from certain installment sales before January 1, 1987	25	
26	Intangible drilling costs preference	26	
27	Other adjustments, including income-based related adjustments	27	
28	Alternative tax net operating loss deduction	28	
29	Alternative minimum taxable income. Combine lines 1 through 28. (If married filing separately and line 29 is more than \$214,900, see page 8 of the instructions.)	29	2,436,067

Alternative Minimum Tax (AMT)

30	Exemption. (If you were under age 24 at the end of 2008, see page 9 of the instructions.)		
	IF your filing status is ... AND line 29 is not over... THEN enter on line 30...		
	Single or head of household \$112,500 \$46,200		
	Married filing jointly or qualifying widow(er) 150,000 69,950		
	Married filing separately 75,000 34,975		
	If line 29 is over the amount shown above for your filing status, see page 8 of the instructions.	30	
31	Subtract line 30 from line 29. If more than zero, go to line 32. If zero or less, enter -0- here and on lines 34 and 36 and skip the rest of Part II	31	2,436,067
32	<ul style="list-style-type: none"> If you are filing Form 2555 or 2555-EZ, see page 9 of the instructions for the amount to enter. If you reported capital gain distributions directly on Form 1040, line 13; you reported qualified dividends on Form 1040, line 9b; or you had a gain on both lines 15 and 16 of Schedule D (Form 1040) (as refigured for the AMT, if necessary), complete Part III on the back and enter the amount from line 55 here. All others: If line 31 is \$175,000 or less (\$87,500 or less if married filing separately), multiply line 31 by 26% (.26). Otherwise, multiply line 31 by 28% (.28) and subtract \$3,500 (\$1,750 if married filing separately) from the result. 	32	365,410
33	Alternative minimum tax foreign tax credit (see page 9 of the instructions)	33	328
34	Tentative minimum tax. Subtract line 33 from line 32	34	365,082
35	Tax from Form 1040, line 44 (minus any tax from Form 4972 and any foreign tax credit from Form 1040, line 47). If you used Schedule J to figure your tax, the amount from line 44 of Form 1040 must be refigured without using Schedule J (see page 11 of the instructions)	35	363,915
36	AMT. Subtract line 35 from line 34. If zero or less, enter -0-. Enter here and on Form 1040, line 45	36	1,167

For Paperwork Reduction Act Notice, see page 12 of the instructions.

IS AMENDEDForm **6251** (2008)

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JAMES D PIERON, JR.

Form 6251 (2008)

Page 2

Tax Computation Using Maximum Capital Gains Rates

37	Enter the amount from Form 6251, line 31. If you are filing Form 2555 or 2555-EZ, enter the amount from line 3 of the worksheet on page 9 of the instructions	37	2,523,667
38	Enter the amount from line 6 of the Qualified Dividends and Capital Gain Tax Worksheet in the instructions for Form 1040, line 44, or the amount from line 13 of the Schedule D Tax Worksheet on page D-10 of the instructions for Schedule D (Form 1040), whichever applies (as figured for the AMT, if necessary) (see page 11 of the instructions). If you are filing Form 2555 or 2555-EZ, see page 11 of the instructions for the amount to enter	38	2,436,067
39	Enter the amount from Schedule D (Form 1040), line 19 (as figured for the AMT, if necessary) (see page 11 of the instructions). If you are filing Form 2555 or 2555-EZ, see page 11 of the instructions for the amount to enter	39	0
40	If you did not complete a Schedule D Tax Worksheet for the regular tax or the AMT, enter the amount from line 38. Otherwise, add lines 38 and 39, and enter the smaller of that result or the amount from line 10 of the Schedule D Tax Worksheet (as figured for the AMT, if necessary). If you are filing Form 2555 or 2555-EZ, see page 11 of the instructions for the amount to enter	40	2,436,067
41	Enter the smaller of line 37 or line 40	41	2,436,067
42	Subtract line 41 from line 37	42	87,600
43	If line 42 is \$175,000 or less (\$87,500 or less if married filing separately), multiply line 42 by 26% (.26). Otherwise, multiply line 42 by 28% (.28) and subtract \$3,500 (\$1,750 if married filing separately) from the result	43	22,776
44	Enter: <ul style="list-style-type: none"> \$65,100 if married filing jointly or qualifying widow(er), \$32,550 if single or married filing separately, or \$43,650 if head of household. 	44	32,550
45	Enter the amount from line 7 of the Qualified Dividends and Capital Gain Tax Worksheet in the instructions for Form 1040, line 44, or the amount from line 14 of the Schedule D Tax Worksheet on page D-10 of the instructions for Schedule D (Form 1040), whichever applies (as figured for the regular tax). If you did not complete either worksheet for the regular tax, enter -0-	45	87,600
46	Subtract line 45 from line 44. If zero or less, enter -0-	46	0
47	Enter the smaller of line 37 or line 38	47	2,436,067
48	Enter the smaller of line 46 or line 47	48	
49	Subtract line 48 from line 47	49	2,436,067
50	Multiply line 49 by 15% (.15) If line 39 is zero or blank, skip lines 51 and 52 and go to line 53. Otherwise, go to line 51.	50	365,410
51	Subtract line 47 from line 41	51	
52	Multiply line 51 by 25% (.25)	52	
53	Add lines 43, 50, and 52	53	388,186
54	If line 37 is \$175,000 or less (\$87,500 or less if married filing separately), multiply line 37 by 26% (.26). Otherwise, multiply line 37 by 28% (.28) and subtract \$3,500 (\$1,750 if married filing separately) from the result	54	703,127
55	Enter the smaller of line 53 or line 54 here and on line 32. If you are filing Form 2555 or 2555-EZ, do not enter this amount on line 32. Instead, enter it on line 4 of the worksheet on page 9 of the instructions	55	388,186

Form 6251 (2008)

AS AMENDED

DAA

00314

Form 6781 Department of the Treasury Internal Revenue Service	Gains and Losses From Section 1256 Contracts and Straddles ► Attach to your tax return.	OMB No. 1545-0644 2008 Attachment Sequence No. 82
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Name(s) shown on tax return

JAMES D PIERON, JR.

Identifying number

Check all applicable boxes (see instructions).

A

Mixed straddle election

C

Mixed straddle account election

B

Straddle-by-straddle identification election

D

Net section 1256 contracts loss election

Section 1256 Contracts Marked to Market

(a) Identification of account	(b) (Loss)	(c) Gain
1 JP MORGAN	0	1,046,617
SAXOBANK	-600,141	
2 Add the amounts on line 1 in columns (b) and (c)	2 (600,141	1,046,617
3 Net gain or (loss). Combine line 2, columns (b) and (c)		3 446,476
4 Form 1099-B adjustments. See instructions and attach schedule		4
5 Combine lines 3 and 4		5 446,476
Note: If line 5 shows a net gain, skip line 6 and enter the gain on line 7. Partnerships and S corporations, see instructions.		
6 If you have a net section 1256 contracts loss and checked box D above, enter the amount of loss to be carried back. Enter the loss as a positive number		6
7 Combine lines 5 and 6		7 446,476
8 Short-term capital gain or (loss). Multiply line 7 by 40% (.40). Enter here and include on the appropriate line of Schedule D (see instructions)		8 178,590
9 Long-term capital gain or (loss). Multiply line 7 by 60% (.60). Enter here and include on the appropriate line of Schedule D (see instructions)		9 267,886

Gains and Losses From Straddles. Attach a separate schedule listing each straddle and its components.**Section A-Losses From Straddles**

(a) Description of property	(b) Date entered into or acquired	(c) Date closed out or sold	(d) Gross sales price	(e) Cost or other basis plus expense of sale	(f) Loss. If column (e) is more than (d), enter difference. Otherwise, enter -0-	(g) Unrecognized gain on offsetting positions	(h) Recognized loss. If column (f) is more than (g), enter difference. Otherwise, enter -0-
10							
11a Enter the short-term portion of losses from line 10, column (h), here and include on the appropriate line of Schedule D (see instructions)							11a ()
b Enter the long-term portion of losses from line 10, column (h), here and include on the appropriate line of Schedule D (see instructions)							11b ()

Section B-Gains From Straddles

(a) Description of property	(b) Date entered into or acquired	(c) Date closed out or sold	(d) Gross sales price	(e) Cost or other basis plus expense of sale	(f) Gain. If column (d) is more than (e), enter difference. Otherwise, enter -0-
12					
13a Enter the short-term portion of gains from line 12, column (f), here and include on the appropriate line of Schedule D (see instructions)					13a
b Enter the long-term portion of gains from line 12, column (f), here and include on the appropriate line of Schedule D (see instructions)					13b

Unrecognized Gains From Positions Held on Last Day of Tax Year. Memo Entry Only (see instructions)

(a) Description of property	(b) Date acquired	(c) Fair market value on last business day of tax year	(d) Cost or other basis as adjusted	(e) Unrecognized gain. If column (c) is more than (d), enter difference. Otherwise, enter -0-
14				

AS AMENDED

Form **2555****Foreign Earned Income**

OMB No. 1545-0074

2008Attachment
Sequence No. **34**Department of the Treasury
Internal Revenue Service

▶ See separate instructions.

▶ Attach to Form 1040.

For Use by U.S. Citizens and Resident Aliens Only

Name shown on Form 1040

JAMES D**PIERON, JR.**

Your social security number

General Information

1 Your foreign address (including country) SEE STATEMENT 3		2 Your occupation CEO JDFX TECHNOLOGIES	
3 Employer's name ▶ JDFX TECHNOLOGIES			
4a Employer's U.S. address ▶			
b Employer's foreign address ▶ SEE STATEMENT 4			
5 Employer is (check ▶ a <input checked="" type="checkbox"/> A foreign entity b <input type="checkbox"/> A U.S. company c <input type="checkbox"/> Self any that apply): d <input type="checkbox"/> A foreign affiliate of a U.S. company e <input type="checkbox"/> Other (specify) ▶			
6a If, after 1981, you filed Form 2555 or Form 2555-EZ, enter the last year you filed the form. ▶ 2007			
b If you did not file Form 2555 or 2555-EZ after 1981 to claim either of the exclusions, check here ▶ <input type="checkbox"/> and go to line 7.			
c Have you ever revoked either of the exclusions? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
d If you answered "Yes," enter the type of exclusion and the tax year for which the revocation was effective. ▶			
7 Of what country are you a citizen/national? ▶ UNITED STATES			
8a Did you maintain a separate foreign residence for your family because of adverse living conditions at your tax home? See Second foreign household on page 3 of the instructions <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
b If "Yes," enter city and country of the separate foreign residence. Also, enter the number of days during your tax year that you maintained a second household at that address. ▶			
9 List your tax home(s) during your tax year and date(s) established ZURICH, SWITZERLAND 1/01/02			

Next, complete either Part II or Part III. If an item does not apply, enter "NA." If you do not give the information asked for, any exclusion or deduction you claim may be disallowed.

Taxpayers Qualifying Under Bona Fide Residence Test (see page 2 of the instructions)

10 Date bona fide residence began ▶ 1/01/08	and ended ▶ CONTINUES
11 Kind of living quarters in foreign country ▶ a <input type="checkbox"/> Purchased house b <input checked="" type="checkbox"/> Rented house or apartment c <input type="checkbox"/> Rented room d <input type="checkbox"/> Quarters furnished by employer	
12a Did any of your family live with you abroad during any part of the tax year? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
b If "Yes," who and for what period? ▶ NA	
13a Have you submitted a statement to the authorities of the foreign country where you claim bona fide residence that you are not a resident of that country? See instructions <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
b Are you required to pay income tax to the country where you claim bona fide residence? See instructions <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
If you answered "Yes" to 13a and "No" to 13b, you do not qualify as a bona fide resident. Do not complete the rest of this part.	

14 If you were present in the United States or its possessions during the tax year, complete columns (a)-(d) below. Do not include the income from column (d) in Part IV, but report it on Form 1040.

(a) Date arrived in U.S.	(b) Date left U.S.	(c) Number of days in U.S. on business	(d) Income earned in U.S. on business (attach computation)	(a) Date arrived in U.S.	(b) Date left U.S.	(c) Number of days in U.S. on business	(d) Income earned in U.S. on business (attach computation)

15a List any contractual terms or other conditions relating to the length of your employment abroad. ▶ **NA**

b Enter the type of visa under which you entered the foreign country. ▶ **B. PERMIT**

c Did your visa limit the length of your stay or employment in a foreign country? If "Yes," attach explanation ☐ Yes ☒ No

d Did you maintain a home in the United States while living abroad? ☐ Yes ☒ No

e If "Yes," enter address of your home, whether it was rented, the names of the occupants, and their relationship to you. ▶ **NA**

For Paperwork Reduction Act Notice, see page 4 of separate instructions

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Part III Taxpayers Qualifying Under Physical Presence Test (see page 2 of the instructions)

- 16** The physical presence test is based on the 12-month period from **▶** through **▶**
- 17** Enter your principal country of employment during your tax year. **▶**
- 18** If you traveled abroad during the 12-month period entered on line 16, complete columns (a)-(f) below. Exclude travel between foreign countries that did not involve travel on or over international waters, or in or over the United States, for 24 hours or more. If you have no travel to report during the period, enter "Physically present in a foreign country or countries for the entire 12-month period." Do not include the income from column (f) below in Part IV, but report it on Form 1040.

(a) Name of country (including U.S.)	(b) Date arrived	(c) Date left	(d) Full days present in country	(e) No. of days in U.S. on busn.	(f) Income earned in U.S. on business (attach computation)

Part IV All Taxpayers

Note: Enter on lines 19 through 23 all income, including noncash income, you earned and actually or constructively received during your 2008 tax year for services you performed in a foreign country. If any of the foreign earned income received this tax year was earned in a prior tax year, or will be earned in a later tax year (such as a bonus), see the instructions. Do not include income from line 14, column (d), or line 18, column (f). Report amounts in U.S. dollars, using the exchange rates in effect when you actually or constructively received the income.

If you are a cash basis taxpayer, report on Form 1040 all income you received in 2008, no matter when you performed the service.

2008 Foreign Earned Income		Amount (in U.S. dollars)
19 Total wages, salaries, bonuses, commissions, etc.	19	90,995
20 Allowable share of income for personal services performed (see instructions):		
a In a business (including farming) or profession	20a	
b In a partnership. List partnership's name and address and type of income. ▶	20b	
21 Noncash income (market value of property or facilities furnished by employer—attach statement showing how it was determined):		
a Home (lodging)	21a	
b Meals	21b	
c Car	21c	
d Other property or facilities. List type and amount. ▶	21d	
22 Allowances, reimbursements, or expenses paid on your behalf for services you performed:		
a Cost of living and overseas differential	22a	
b Family	22b	
c Education	22c	
d Home leave	22d	
e Quarters	22e	
f For any other purpose. List type and amount. ▶	22f	
g Add lines 22a through 22f	22g	
23 Other foreign earned income. List type and amount. ▶	23	
24 Add lines 19 through 21d, line 22g, and line 23	24	90,995
25 Total amount of meals and lodging included on line 24 that is excludable (see instructions)	25	
26 Subtract line 25 from line 24. Enter the result here and on line 27 on page 3. This is your 2008 foreign earned income ▶	26	90,995

Form 2555 (2008)

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JAMES D

PIERON, JR.

Page 3

All Taxpayers

27 Enter the amount from line 26

27

90,995

Are you claiming the housing exclusion or housing deduction?

☐ Yes. Complete Part VI.☒ No. Go to Part VII.

Taxpayers Claiming the Housing Exclusion and/or Deduction

28 Qualified housing expenses for the tax year (see instructions)

28

29a Enter location where housing expenses incurred (see instructions) ▶

b Enter limit on housing expenses (see instructions)

29b

30 Enter the smaller of line 28 or line 29b

30

31 Number of days in your qualifying period that fall within your 2008 tax year (see instructions)

31

days

32 Multiply \$38.30 by the number of days on line 31. If 366 is entered on line 31, enter \$14,016.00 here

32

33 Subtract line 32 from line 30. If the result is zero or less, do not complete the rest of this part or any of Part IX

33

34 Enter employer-provided amounts (see instructions)

34

35 Divide line 34 by line 27. Enter the result as a decimal (rounded to at least three places), but do not enter more than "1.000"

35

x

36 Housing exclusion. Multiply line 33 by line 35. Enter the result but do not enter more than the amount on line 34. Also, complete Part VIII

36

Note: The housing deduction is figured in Part IX. If you choose to claim the foreign earned income exclusion, complete Parts VII and VIII before Part IX.

Taxpayers Claiming the Foreign Earned Income Exclusion

37 Maximum foreign earned income exclusion

37

87,600

38 • If you completed Part VI, enter the number from line 31.

• All others, enter the number of days in your qualifying period that fall within your 2008 tax year (see the instructions for line 31).

38

366 days

39 • If line 38 and the number of days in your 2008 tax year (usually 366) are the same, enter "1.000."

• Otherwise, divide line 38 by the number of days in your 2008 tax year and enter the result as a decimal (rounded to at least three places).

39

x

1.000

40 Multiply line 37 by line 39

40

87,600

41 Subtract line 36 from line 27

41

90,995

42 Foreign earned income exclusion. Enter the smaller of line 40 or line 41. Also, complete Part VIII

42

87,600

Taxpayers Claiming the Housing Exclusion, Foreign Earned Income Exclusion, or Both

43 Add lines 36 and 42

43

87,600

44 Deductions allowed in figuring your adjusted gross income (Form 1040, line 37) that are allocable to the excluded income. See instructions and attach computation

44

45 Subtract line 44 from line 43. Enter the result here and in parentheses on Form 1040, line 21. Next to the amount enter "Form 2555." On Form 1040, subtract this amount from your income to arrive at total income on Form 1040, line 22

45

87,600

Taxpayers Claiming the Housing Deduction — Complete this part only if (a) line 33 is more than line 36 and (b) line 27 is more than line 43.

46 Subtract line 36 from line 33

46

47 Subtract line 43 from line 27

47

48 Enter the smaller of line 46 or line 47

48

Note: If line 47 is more than line 48 and you could not deduct all of your 2007 housing deduction because of the 2007 limit, use the worksheet on page 4 of the instructions to figure the amount to enter on line 49. Otherwise, go to line 50.

49 Housing deduction carryover from 2007 (from worksheet on page 4 of the instructions)

49

50 Housing deduction. Add lines 48 and 49. Enter the total here and on Form 1040 to the left of line 36. Next to the amount on Form 1040, enter "Form 2555." Add it to the total adjustments reported on that line

50

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Form 2555 (2008)

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Federal Statements

Statement 1 - Form 1116, Reduction in Foreign Taxes

Description	Amount
1. FORM 1116, PAGE 2, LINE 9, TOTAL FOREIGN TAXES PAID OR ACCRUED FOR CATEGORY OF INCOME.....	\$
2. FOREIGN EARNED INCOME EXCLUDED FOR THE TAX YEAR.....	8,799 87,600
3. OTHERWISE DEDUCTIBLE EXPENSES ALLOCABLE TO EXCLUDED FOREIGN EARNED INCOME.....	0
4. LINE 2 MINUS LINE 3. THIS IS THE NUMERATOR OF REDUCTION RATIO.....	87,600
5. FOREIGN EARNED INCOME RECEIVED DURING THE TAX YEAR.....	90,995
6. DEDUCTIBLE EXPENSES ALLOCABLE TO FOREIGN EARNED INCOME RECEIVED DURING THE TAX YEAR.....	0
7. LINE 5 MINUS LINE 6. THIS IS THE DENOMINATOR OF REDUCTION RATIO.....	90,995
8. DIVIDE LINE 4 BY LINE 7. THIS IS THE REDUCTION RATIO.....	0.9627
9. LINE 1 TIMES LINE 8. THIS IS THE REDUCTION IN FOREIGN TAXES ON FORM 1116 LINE 12.....	8,471
TOTAL	\$ <u>8,471</u>

AS AMENDED

Federal Statements

Statement 2 - Form 1116 AMT, Reduction in Foreign Taxes

Description	Amount
1. FORM 1116, PAGE 2, LINE 9, TOTAL FOREIGN TAXES PAID OR ACCRUED FOR CATEGORY OF INCOME.....	\$
2. FOREIGN EARNED INCOME EXCLUDED FOR THE TAX YEAR.....	8,799
3. OTHERWISE DEDUCTIBLE EXPENSES ALLOCABLE TO EXCLUDED FOREIGN EARNED INCOME.....	87,600
4. LINE 2 MINUS LINE 3. THIS IS THE NUMERATOR OF REDUCTION RATIO.....	0
5. FOREIGN EARNED INCOME RECEIVED DURING THE TAX YEAR.....	87,600
6. DEDUCTIBLE EXPENSES ALLOCABLE TO FOREIGN EARNED INCOME RECEIVED DURING THE TAX YEAR.....	90,995
7. LINE 5 MINUS LINE 6. THIS IS THE DENOMINATOR OF REDUCTION RATIO.....	0
8. DIVIDE LINE 4 BY LINE 7. THIS IS THE REDUCTION RATIO.....	90,995
9. LINE 1 TIMES LINE 8. THIS IS THE REDUCTION IN FOREIGN TAXES ON FORM 1116 LINE 12.....	0.9627
TOTAL	8,471
	\$ 8,471

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Federal Statements

Statement 3 - Form 2555, Part I, Line 1 - Your Foreign Address

Foreign Street Address	Foreign State/Province	Foreign City	Foreign Country	Foreign Postal Code
112 UNIVERSITATSTRASSE ZURICH			8006 SWITZERLAND	

Statement 4 - Form 2555, Part I, Line 4b - Employer's Foreign Address

Foreign Street Address	Foreign State/Province	Foreign City	Foreign Country	Foreign Postal Code
USTERISTRASSE 9 ZURICH			8001 SWITZERLAND	

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Form **1040****AMT Schedule D Tax Worksheet**

2018

Name

JAMES D PIERON, JR.

Taxpayer Identification Number

NOTE: All forms referenced below refer to the AMT versions

SEE FOREIGN EARNED INCOME TAX WRK AMT LN 3 FOR TAXABLE INCOME REPORTED ON LN 1.

1. Enter the amount from Form 6251, line 31. (However, if you are filing Form 2555 or 2555-EZ (relating to foreign earned income), enter instead the amount from line 3 of the AMT Foreign Earned Income Tax Worksheet on page 9 of the Form 6251 instructions) **1. 2,523,667**
2. Enter your qualified dividends from Form 1040, line 9b (or Form 1040NR, line 10b) **2. _____**
3. Form 4952, line 4g amount **3. _____**
4. Form 4952, line 4e amount **4. _____**
5. Subtract line 4 from line 3. If zero or less, enter -0- **5. 0**
6. Subtract line 5 from line 2. If zero or less, enter -0- **6. 0**
7. Enter the **smaller** of line 15 or line 16 of Schedule D **7. 9,441,323**
8. Enter the **smaller** of line 3 or line 4 **8. _____**
9. Subtract line 8 from line 7. If zero or less, enter -0- **9. 2,436,067**
10. Add lines 6 and 9 **10. 2,436,067**
11. Add the AMT 28% Rate Capital Gain and the AMT Unrecaptured Section 1250 Gain **11. _____**
12. Enter the **smaller** of line 9 or line 11 **12. _____**
13. Subtract line 12 from line 10. Enter the result here and on Form 6251, line 38 **13. 2,436,067**

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